

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

STEVEN MARANDOLA,

Plaintiff,

v.

AVERTIUM HOLDINGS, LLC,
AVERTIUM, LLC, and AVERTIUM
TENNESSEE, INC.,

Defendants.

Case No. 3:25-cv-00084-KAC-DCP

District Judge Crytzer

Magistrate Judge Poplin

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Defendants Avertium, LLC and Avertium Tennessee, Inc., by and through their undersigned counsel, move for an extension of time to respond to Plaintiff's complaint. Counsel have conferred and this motion is unopposed.

Defendants Avertium, LLC and Avertium Tennessee were served on March 11, 2025.¹ (D.E. 8; D.E. 9.) The Parties stipulated to initial 21-day extension of time for Avertium, LLC and Avertium Tennessee to respond to the complaint pursuant to Local Rule 12.1(a), making the deadline April 22. (D.E. 10.) Now, the Parties are engaged in settlement negotiations. Avertium, LLC and Avertium Tennessee therefore request an additional 30 days to focus their immediate efforts on settlement.

On April 17, 2025, Counsel for Defendants conferred with Plaintiff's counsel, John Sten, regarding this motion. Plaintiff's counsel stated that Plaintiff has no objection.

For the reasons discussed above, the Court should grant Avertium, LLC and Avertium

¹ Defendant Avertium Holdings, LLC has not yet been served.

Tennessee's unopposed motion and extend the deadline for them to respond to Plaintiff's complaint by 30 days, up to and including May 22, 2025.

Date: April 17, 2025

Respectfully submitted,

AVERTIUM, LLC and AVERTIUM
TENNESSEE, INC.

/s/ Benjamin S. Morrell

Benjamin S. Morrell (TBPR No. 35480)

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record.

Date: April 17, 2025

/s/ Benjamin S. Morrell